

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

**UNITED STATES OF AMERICA**

**Plaintiff,**

**VS.**

**CHIQUITA SMITH**

**Defendant.**

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**DOCKET NO. 2:11cr020-MHT**

**MOTION TO CONTINUE**

COMES NOW the defendant, by and through her attorney, and moves this Honorable Court to continue the above-styled cause now set for trial on April 16, 2012.

As grounds counsel would show unto the Court the following:

1. That counsel for the defendant has received the discovery in the above-styled cause.
2. That the discovery consist of approximately fifteen (15) disc and each disc contains volumes of documents.
3. That the basis of the defendant's sentence would be determined by the amount of involvement she had in the alleged conspiracy.
4. That it would be in the best interest of the defendant if additional time is granted to allow defense counsel and the U.S. Attorney's Office (Brent Woodall) an opportunity to review those documents that directly relate to any activity involving the defendant.
5. That a continuance of this matter would not prejudice the government and would benefit the defendant.

6. That the U.S. Attorney's Office (Brent Woodall) has no objection to a continuance of this matter.

**WHEREFORE**, the premises considered, counsel for the defendant respectfully request a continuance in the above-styled cause and reschedule the same at the Court's earliest convenience.

Respectfully submitted this 5<sup>th</sup> day of March, 2012.

/s/Valerie M. Smedley

**VALERIE MURRY SMEDLEY** SME003  
**Attorney for Defendant Chiquita Smith**

**ADDRESS OF COUNSEL:**

459 South McDonough Street  
Montgomery, AL 36104  
(334) 230-9596

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing Motion to Continue upon the Honorable W. Brent Woodall, Assistant U.S. Attorney, Middle District of Alabama, by electronically filing a copy with the Clerk of the Court using the CM/ECF system on this the 5<sup>th</sup> day of March, 2012.

/s/Valerie M. Smedley

**VALERIE MURRY SMEDLEY**  
**Attorney for Defendant Chiquita Smith**